

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Chester C. Graham,

Court File No. 20-1791 (PJS/BRT)

Plaintiff,

v.

Edge Financial, Inc.,

Defendant.

**DEFENDANT'S MOTION TO
DISMISS FOR LACK OF PERSONAL
JURISDICTION AND FAILURE TO
STATE A CLAIM**

Defendant Edge Financial, Inc. moves this Court for an order dismissing the Complaint under Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6) for lack of personal jurisdiction and failure to state a claim for which relief can be granted. This motion is supported by an accompanying memorandum of law, one declaration, arguments of counsel, and all the files, records, and proceedings in this case.

Dated: February 23, 2021

TAFT STETTINIUS & HOLLISTER LLP

By: /s/ O. Joseph Balthazor Jr.

Andrew M. Carlson (#0284828)

ACarlson@Taftlaw.com

O. Joseph Balthazor Jr. (#0399093)

JBalthazor@Taftlaw.com

2200 IDS Center

80 South 8th Street

Minneapolis, MN 55402

Telephone: (612) 977-8400

Facsimile: (612) 977-8650

Attorneys for Defendant

Edge Financial, Inc.